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U.S. SECURITY ASSOCIATES, INC.

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11 ROBERT STONE, on behalf of himself and
all others similarly situated,

12 Plaintiff,

13 v.
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15 U.S. SECURITY ASSOCIATES, INC., a
16 Delaware corporation, and Does 1 through 10,

17 Defendants.
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Case No. 3:15-CV-00235-JST

**STIPULATION AND ~~[PROPOSED]~~
ORDER EXTENDING TIME TO HOLD
RULE 26(f) CONFERENCE AND
EXCHANGE INITIAL DISCLOSURES**

[FED. R. CIV. P. 26 (A)(1)]

Complaint Filed: January 16, 2015

IT IS HEREBY STIPULATED AND REQUESTED by and between the parties who have to date appeared in this action, through their counsel of record, Peter R. Dion-Kindem of The Dion-Kindem Law Firm; Lonnie C. Blanchard, III of The Blanchard Law Group, APC; and Jeffrey D. Holmes of Holmes Law Group, APC, attorneys for Plaintiff ROBERT STONE (“Plaintiff”); and Rod M. Fliegel, Alison S. Hightower and Amanda N. Fu of Littler Mendelson, P.C., attorneys for Defendant U.S. SECURITY ASSOCIATES, INC. (“Defendant”), based upon the following recitals:

1. WHEREAS Defendant filed a motion to transfer venue to the Northern District of Georgia that is currently set to be heard on April 9, 2015;

2. WHEREAS, the Court's current schedule provides that the last day for the Parties to meet and confer pursuant to this Court's Standing Order, Civil Rule 16-3 and Federal Rule of Civil Procedure, Rule 26(f)(1) is April 8, 2015;

3. WHEREAS, the Parties' Rule 26 Initial Disclosures must currently be exchanged by April 22, 2015 and the initial Case Management Conference in this action is currently set for April 29, 2015;

4. WHEREAS, a transfer of venue likely will result in additional or different schedules and requirements for discovery, and thus a modest delay on these initial discovery and disclosure obligations will further efficient and effective case management and thus serve the interests of economy for the Court and all Parties;

STIPULATION

Pursuant to this Court's Standing Order and Civil Rule 16-2(e), so as to promote efficient and effective case management and thus serve the interests of economy for the Court and all Parties, the Parties hereby stipulate, agree and respectfully request:

1. That the last day for the Parties to meet and confer pursuant to this Court's Standing Order, Civil Rule 16-3 and Federal Rule of Civil Procedure, Rule 26(f)(1) is extended to one week from the Court's service of an order on Defendant's Motion To Transfer Venue, assuming the motion is denied;

2. The Parties shall then serve their initial disclosures pursuant to Rule 26 within 14 days of their Rule 26(f) conference:

IT IS SO STIPULATED.

Dated: March 24, 2015.

/s/ Peter R. Dion-Kindem

PETER R. DION-KINDEM
THE DION-KINDEM LAW FIRM
Attorneys for Plaintiff
ROBERT STONE

Dated: March 24, 2015.

/s/ Alison S. Hightower

ROD M. FLIEGEL
ALISON S. HIGHTOWER
LITTLER MENDELSON, P.C.
Attorneys for Defendant
U.S. SECURITY ASSOCIATES, INC.

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: March 26, 2015


HON. JON S. TIGAR
U.S. DISTRICT COURT JUDGE